

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

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| IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION | Master File No. 2:12-MD-02327 MDL No. 2327 |
| THIS DOCUMENT RELATES TO: ALL WAVE 6 CASES AND THOSE ON ATTACHED EXHIBIT A | JOSEPH R. GOODWIN U.S. DISTRICT JUDGE |

**PLAINTIFFS' MOTION TO EXCLUDE OR OTHERWISE LIMIT THE OPINIONS
AND TESTIMONY OF DEFENSE EXPERT LAWRENCE, M.D.**

COMES NOW Plaintiffs in actions listed on attached Exhibit A, by and through the undersigned attorneys, and files Plaintiffs' Motion to Exclude, or in the Alternative, to Limit the Opinions and Testimony of Lawrence Lind, M.D. and would respectfully show the Court that Lind should be excluded for the following reasons:

1. Dr. Lind's opinions are unreliable because he failed to use a reliable, scientific methodology when formulating his opinions in these cases.
2. In support of this motion, Plaintiffs have submitted a memorandum of law and also rely upon the following attached exhibits:
 - a) A true copy of excerpts of the General Deposition of Dr. Lawrence Lind dated October 11, 2017, is attached hereto as Exhibit B.
 - b) A true copy of Dr. Lawrence Lind's General Expert Report on Gynemesh and Prolift served on August 13, 2017, defendants' disclosed Gynecological & Urogynecological expert, is attached hereto as Exhibit C.

- c) A true copy of Dr. Lawrence Lind's Curriculum Vitae is attached hereto as Exhibit D.
- d) A true copy of Dr. Lawrence Lind's General Reliance list attached hereto as Exhibit E.
- e) A true copy of Dr. Lawrence Lind's Supplemental Reliance list attached hereto as Exhibit F.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that the Court grant their Motion To Exclude Or Otherwise Limit The Opinions and Testimony of Defense Expert Lawrence Lind, M.D. Additionally, Plaintiffs request all other and further relief to which they may be justly entitled.

Dated: October 23, 2017.

Respectfully submitted,

/s/ D. Renee Baggett
Bryan F. Aylstock, Esq.
Renee Baggett, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)
baylstock@awkolaw.com
rbaggett@awkolaw.com
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document October 23, 2017, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ D. Renee Baggett
Bryan F. Aylstock, Esq.
Renee Baggett, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)
baylstock@awkolaw.com
rbaggett@awkolaw.com
Attorneys for Plaintiffs